

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

Litchfield Financial Corporation, *et al.*,

Plaintiffs

v.

Buyers Source Real Estate Group, *et al.*,

Defendants

No. 04-CV-30076-KPN

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5.3(b) of the United States District Court for the District of Massachusetts, and the attached Certificates, the undersigned, a member in good standing of the bar of this Court, hereby moves for permission for Christopher F. Dugan and James E. Anklam of the law firm of Paul, Hastings, Janofsky & Walker, LLP, 1299 Pennsylvania Avenue, 10th Floor, Washington, DC 20004, to appear pro hac vice and represent the Plaintiffs Litchfield Financial Corporation, Textron Financial Corporation, and Land Finance Company in this case. In support of this motion, the undersigned represents the following:

1. Christopher Dugan is admitted to practice in the courts of the District of Columbia. He is also admitted to practice before the United States Court of Appeals for the Second Circuit; the United States District Courts for the District of Columbia, the District of Maryland and the Northern District of New York. Certificate of Christopher Dugan (hereinafter "Dugan Certificate") at ¶¶ 1, 2.

2 James Anklam is admitted to practice in the courts of the Commonwealth of Virginia and the District of Columbia. He is also admitted to practice before the United States

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Supreme Court; the United States Courts of Appeals for the District of Columbia and the Fourth Circuit; the United States District Courts for the District of Columbia, the Eastern District of Virginia, and the District of Maryland; and the United States Bankruptcy Court for the Eastern District of Virginia. Certificate of James Anklaam (hereinafter "Anklaam Certificate") at ¶¶ 1, 2.

3. Both Mr. Dugan and Mr. Anklaam are members in good standing of every court in which they are admitted. Dugan Certificate at ¶¶ 1, 2; Anklaam Certificate at ¶¶ 1, 2.

4. Neither Mr. Dugan nor Mr. Anklaam has any grievances or disciplinary proceedings pending against him in any Court in which he is admitted to practice. Dugan Certificate at ¶ 4; Anklaam Certificate at ¶ 4.

5. Neither Mr. Dugan nor Mr. Anklaam has been reprimanded, suspended, placed on inactive status, disbarred nor resigned from the practice of law in any other Court. Dugan Certificate at ¶ 5; Anklaam Certificate at ¶ 5.

6. Both Mr. Dugan and Mr. Anklaam are familiar with the Local Rules of the United States District Court for the District of Massachusetts. Dugan Certificate at ¶ 6; Anklaam Certificate at ¶ 6.

WHEREFORE, the undersigned respectfully moves that this Court allows Christopher F. Dugan and James E. Anklam to participate in this action pro hac vice so that they may file pleadings and be heard at hearings in this case.

Dated: September __, 2004

Respectfully submitted,
Counsel for Plaintiffs

LITCHFIELD FINANCIAL COMPANY
TEXTRON FINANCIAL CORPORATION
AND LAND FINANCE COMPANY

By: Jeffrey L. McCormick

Jeffrey L. McCormick, Esq. of
Robinson Donovan, P.C.
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Springfield, Massachusetts 01115
Phone (413) 732-2301 Fax (413) 785-4658
BBO No. 329740

WDC/285405.1

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by mail/by hand.

Date: 9/8/04 Jeffrey L. McCormick

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Litchfield Financial Corporation, <i>et al.</i> ,)	
)	
<i>Plaintiffs</i>)	
v.)	No. 04-CV-30076-KPN
)	
Buyers Source Real Estate Group, <i>et al.</i> ,)	
)	
<i>Defendants</i>)	
)	

CERTIFICATE OF CHRISTOPHER DUGAN

I, Christopher F. Dugan, Esquire, declare that:

1. I am admitted to practice in the courts of the District of Columbia and have been a member in good standing of the District of Columbia bar since 1982.

2. In addition, I am admitted to practice before the United States Court of Appeals for the Second Circuit; the United States District Courts for the District of Columbia, the District of Maryland and the Northern District of New York. I am a member in good standing of all these courts.

3. I practice with the law firm of Paul, Hastings, Janofsky & Walker, LLP, 1299 Pennsylvania Avenue, NW, 10th Floor, Washington, DC 20004.

4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

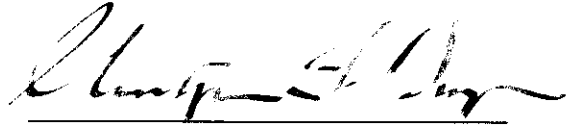
5. I have never been reprimanded, suspended, placed on inactive status, disbarred nor resigned from the practice of law in any jurisdiction.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

7. Accordingly, I respectfully request pursuant to Local R. 83.5.3(b) that I be permitted to appear pro hac vice on behalf of Plaintiffs Litchfield Financial Corporation, Land Finance Company, and Textron Financial Corporation in this action.

Further declarant sayeth naught. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 7, 2004

A handwritten signature in black ink, appearing to read "Christopher F. Dugan", written over a horizontal line.

Christopher F. Dugan

IN THE UNITED STATES DISTRICT COURT
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<i>Plaintiffs</i>)	
v.)	No. 04-CV-30076-KPN
)	
Buyers Source Real Estate Group, <i>et al.</i> ,)	
)	
<i>Defendants</i>)	
)	

CERTIFICATE OF JAMES ANKLAM

I, James E. Anklam, Esquire, declare that:

1. I am admitted to practice in the courts of the Commonwealth of Virginia and have been a member in good standing of the Virginia State Bar since 1987. I am also admitted to practice in the courts of the District of Columbia and have been a member in good standing of the District of Columbia Bar since 1988.

2. In addition, I am admitted to practice before the United States Supreme Court; the United States Courts of Appeals for the District of Columbia and the Fourth Circuit; the United States District Courts for the District of Columbia, the Eastern District of Virginia, and the District of Maryland; and the United States Bankruptcy Court for the Eastern District of Virginia. I am a member in good standing of all these courts.

3. I practice with the law firm of Paul, Hastings, Janofsky & Walker, LLP, 1299 Pennsylvania Avenue, NW, 10th Floor, Washington, DC 20004.

4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

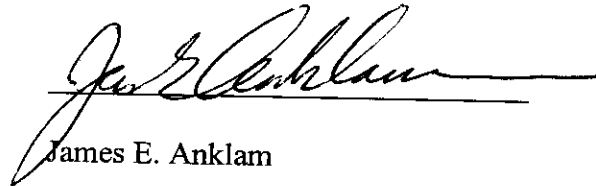
5. I have never been reprimanded, suspended, placed on inactive status, disbarred nor resigned from the practice of law in any jurisdiction.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

7. Accordingly, I respectfully request pursuant to Local R. 83.5.3(b) that I be permitted to appear pro hac vice on behalf of Plaintiffs Litchfield Financial Corporation, Land Finance Company, and Textron Financial Corporation in this action.

Further declarant sayeth naught. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 3, 2004



James E. Anklam